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*Attorneys for Plaintiff Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Estate
of Bernard L. Madoff,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

Adv. Pro. No. 10-04330 (CGM)

**DECLARATION OF MARCO MOLINA IN SUPPORT OF
TRUSTEE'S REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF HIS
MOTIONS FOR ISSUANCE OF LETTERS OF REQUEST**

I, Marco Molina, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Baker & Hostetler LLP, counsel for Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.*, and the estate of Bernard L. Madoff.

2. I submit this declaration in support of the Trustee’s Reply to the Opposition (ECF No. 217) of Defendant Square One Fund Ltd. (“Square One”) to the Trustee’s Motions for the Issuance of Letters of Request for the examinations of Mr. Albert Collette (ECF No. 209), Ms. Melissa Alessandra Massetta Hariri (ECF No. 211), Mr. Luc Deblue (ECF No. 213), and Ms. Catherine Lemaitre (ECF No. 215).

3. Attached hereto as **Exhibit 1** is Square One’s Responses and Objections to Plaintiff’s First Set of Requests for Production of Documents dated October 7, 2019.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a letter from Richard Levin dated February 3, 2020.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a letter from Richard Levin dated May 15, 2020.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a letter from Richard Levin dated March 31, 2020.

7. Attached hereto as **Exhibit 5** is the Trustee’s First Set of Interrogatories dated July 1, 2020.

8. Attached hereto as **Exhibit 6** is the Trustee’s Notice of a Rule 30(b)(6) Deposition to Square One dated July 1, 2020.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a letter from Richard Levin dated August 27, 2020.

10. Attached hereto as **Exhibit 8** is a true and correct copy of the Deloitte Engagement Letter executed by BakerHostetler and Square One dated December 15, 2020.

11. Attached hereto as **Exhibit 9** is a true and correct copy of an email from David J. Clark dated May 11, 2021.

12. Attached hereto as **Exhibit 10** is a true and correct copy of an email from David J. Clark dated June 8, 2021.

13. Attached hereto as **Exhibit 11** is a true and correct copy of an email from Kevin Garcia dated June 11, 2021.

14. Attached hereto as **Exhibit 12** is a true and correct copy of a letter from Richard Levin dated June 16, 2020.

15. Attached hereto as **Exhibit 13** is a true and correct copy of an email from Richard Levin dated July 8, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 14th day of July 2021, at Costa Mesa, California.

/s/ Marco Molina

Marco Molina